

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,	)	CASE NO.: 2:23-cv-6302-HDV-AJR
	)	
	)	
Plaintiff,	)	<b>[PROPOSED] ORDER GRANTING</b>
	)	<b>PLAINTIFF MARK SNOOKAL'S</b>
	)	<b><i>EX PARTE</i> APPLICATION FOR</b>
vs.	)	<b>LEAVE TO SUPPLEMENT</b>
	)	<b>OPPOSITION TO DEFENDANT'S</b>
	)	<b>MOTION FOR SUMMARY</b>
CHEVRON USA, INC., a California	)	<b>JUDGMENT, LEAVE FOR</b>
Corporation, and DOES 1 through	)	<b>PLAINTIFF TO TAKE FURTHER</b>
10, inclusive,	)	<b>DISCOVERY, AND LEAVE TO</b>
	)	<b>FILE MOTION SEEKING</b>
	)	<b>DISCOVERY SANCTIONS</b>
	)	<b>AGAINST DEFENDANTS AND ITS</b>
Defendants.	)	<b>COUNSEL</b>
	)	
	)	
	)	District Judge: Hon. Hernan D. Vera
	)	Magistrate Judge: Hon. A. Joel Richlin
	)	Action Filed: August 3, 2023
	)	Trial Date: February 4, 2025

1 The Court has duly considered Plaintiff's *Ex Parte* Application for Leave to  
2 Supplement Opposition to Defendant's Motion for Summary Judgment, Leave for  
3 Plaintiff to Take Further Discovery, and Leave to File Motion Seeking Discovery  
4 Sanctions Against Defendants and Its Counsel; the Declaration and Exhibits  
5 submitted in support thereof; as well as Defendant's Opposition to Plaintiff's *Ex*  
6 *Parte* Application and the Declaration and Exhibits submitted in support thereof.  
7 The Court finds that there is good cause for Plaintiff's application for *ex parte*  
8 relief given Defendant's inexcusable delay in producing probative documents long  
9 after the close of discovery deadline, and after the briefing on Defendant's Motion  
10 for Summary Judgment was due. The Court hereby grants Plaintiff's *Ex Parte*  
11 Application in whole.

12  
13 **IT IS SO ORDERED.**

14  
15 DATED: \_\_\_\_\_

16 Honorable Hernan D. Vera  
17 United States District Court Judge  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 6300 Wilshire Boulevard, Suite 1500, Los Angeles, California 90048.

On **November 20, 2024** I served the foregoing document described as **[PROPOSED] ORDER GRANTING PLAINTIFF MARK SNOOKAL'S EX PARTE APPLICATION FOR LEAVE TO SUPPLEMENT OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT, LEAVE FOR PLAINTIFF TO TAKE FURTHER DISCOVERY, AND LEAVE TO FILE MOTION SEEKING DISCOVERY SANCTIONS AGAINST DEFENDANTS AND ITS COUNSEL** on interested parties in this action:

**Attorneys for Defendant Chevron USA, Inc.**

Tracey A. Kennedy, Esq.

Robert E. Mussig, Esq.

H. Sarah Fan, Esq.

**SHEPPARD, MULLIN, RICHTER & HAMPTON LLP**

333 South Hope Street, 43<sup>rd</sup> Floor

Los Angeles, CA 90071-1422

(213) 620-1780

e-mail: tkennedy@sheppardmullin.com

e-mail: rmussig@sheppardmullin.com

email: sfan@sheppardmullin.com

**[X] BY ELECTRONIC SERVICE:** Pursuant to the Parties' agreement to accept service electronically, I caused such document to be electronically served via email to the email addresses of the addressee(s).

Executed on **November 20, 2024** at Los Angeles, California.

**[X] Federal** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

  
\_\_\_\_\_  
JOSIE PEÑA